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Attorneys for Defendant
Fried, Frank, Harris, Shriver & Jacobson LLP

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
LESLIE DICK WORLDWIDE, LTD. and	:	
LESLIE DICK,	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
-against-	:	
	:	
GEORGE SOROS, SOROS FUND	:	
MANAGEMENT, LLC, SFM	:	
MANAGEMENT, LLC, CONSECO, INC.,	:	No. 08 CV 7900 (BSJ/THK)
VORNADO REALTY TRUST, GERMAN	:	
AMERICAN CAPITAL CORPORATION,	:	ECF Case
DEUTSCHE BANK AG, EASTDIL	:	
SECURED, LLC, HARRY MACKLOWE,	:	<u>NOTICE OF MOTION</u>
FIG, LLC, CERBERUS CAPITAL	:	
MANAGEMENT, LP., LAZARD FRERES &	:	
CO. LLC, KIRKLAND & ELLIS, LLP, FRIED	:	
FRANK HARRIS SHRIVER & JACOBSON	:	
LLP, CARMEL FIFTH, LLC, 767 MANAGER,	:	
LLC, DONALD J. TRUMP and JOHN DOES	:	
"1" THROUGH "10,"	:	
	:	
<i>Defendants.</i>	:	
	:	
.....	X	

PLEASE TAKE NOTICE that Defendant Fried, Frank, Harris, Shriver & Jacobson LLP (“Fried Frank”) by its undersigned counsel, and pursuant to Fed. R. Civ. P. 12(b)(6), will move before the Honorable Barbara S. Jones, U.S.D.J., at the United States District Courthouse, 500 Pearl Street, New York, New York, 10007, Courtroom 610, on a date and at a time to be determined by the Court, for an Order (i) granting Fried Frank’s motion to dismiss the Complaint without leave to amend because any amendment would be futile; (ii) dismissing the action with prejudice, and (iii) granting Fried Frank such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Fried Frank shall rely upon the accompanying Memorandum of Law in Support of Fried, Frank, Harris, Shriver & Jacobson LLP’s Motion to Dismiss the Action with Prejudice, as well as upon the Brief in Support of the Soros Defendant’s Motion to Dismiss.

Dated: New York, New York
December 22, 2008

FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP

By: /s/ Howard W. Goldstein
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